

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

| | | |
|----------------------------------|---|-------------------|
| TERRA PARTNERS; TERRA XXI, LTD.; | § | |
| ROBERT WAYNE VEIGEL; | § | |
| ELLA MARIE WILLIAMS VEIGEL; | § | |
| VEIGEL FARMS, INC.; | § | |
| VEIGEL CATTLE COMPANY; and | § | |
| VEIGEL FARM PARTNERS, | § | |
| | § | |
| Plaintiffs, | § | |
| | § | |
| v. | § | No. 2:15-cv-236-J |
| | § | Judge Robinson |
| AG ACCEPTANCE CORPORATION, | § | |
| | § | |
| Defendant. | § | |

RESPONSE TO AG ACCEPTANCE'S
MOTION FOR SUMMARY JUDGMENT

Plaintiffs, by and through their counsel, Keleher & McLeod, P.A. ("Plaintiffs") hereby provide their response¹ to Defendant Ag Acceptance's Motion For Summary Judgment [Doc. 55] ("Motion"). Plaintiffs are filing a Brief In Support of this response concurrently herewith, along with an Appendix containing material relied upon in that brief. Plaintiff opposes the Motion for the reasons stated in the accompanying brief and appendix, which are incorporated herein by reference.

¹ This response is timely pursuant to the Court's Order Granting Request For Leave To File Out Of Time, entered on March 23, 2016. [Doc. 65]

WHEREFORE, Plaintiffs request that the Motion be denied.

Respectfully submitted,

KELEHER & MCLEOD, P.A.

By: /s/ Justin B. Breen

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CERTIFICATE OF SERVICE

THIS HEREBY CERTIFIES that on June 29, 2016, I electronically filed the foregoing document with the Clerk of the Court for the Northern District Of Texas by using the CM/ECF system, which will send a notice of electronic filing to the following CM/ECF participants:

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